

1 **DANIEL F. LIPPMANN, ESQ.**

2 Nevada Bar No. 11636

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8 *Attorney for Defendant*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 JONATHAN RISSE-SANTOS,

14 Defendant.

15 } CASE NO: 2:21-mj-00283-EJY

16 } **STIPULATION TO CONTINUE**
17 } **PRELIMINARY HEARING**
18 } **(Fifth Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
20 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
21 for the United States of America, and Daniel F. Lippmann, Esq., counsel for Defendant,
22 JONATHAN RISSE-SANTOS, that the preliminary hearing presently scheduled for December
23 6, 2021, be vacated and continued to a time convenient to the Court but no sooner than 45 days.

24 This Stipulation is entered into for the following reasons:

25 1. Counsels for the United States and Mr. Risse-Santos are in active negotiations and require
26 more time to present and consider offers of resolution.

27 2. To aid in these negotiations, counsel for Mr. Risse-Santos, has procured the services of a
28 psychiatrist to prepare an evaluation. That evaluation has been provided to counsel for the
United States and additional time is needed to finalize negotiations.

- 1 3. Daniel F. Lippmann will not have sufficient and adequate time to effectively and
- 2 thoroughly prepare for preliminary hearing and present an appropriate defense in the
- 3 above-captioned matter on the date currently set for preliminary hearing.
- 4 4. Mr. Risse-Santos is in custody and does not object to the continuance.
- 5 5. Furthermore, denial of this request for continuance could result in a miscarriage of justice.
- 6 6. The parties agree to the continuance.
- 7 7. This is the fifth request for a continuance.

8 The additional time requested by this stipulation is excludable in computing the time
9 within which the defendant must be indicted and the trial herein must commence pursuant to the
10 Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18
11 U.S.C. § 3161(h)(7)(B)(i) and (iv).

13 DATED this 16th day of November, 2021

16 s/Bianca R. Pucci
17 BIANCA R. PUCCI, ESQ.
18 Assistant United States Attorney

16 s/Daniel F. Lippmann
17 DANIEL F. LIPPmann, ESQ.
18 Nevada Bar No. 11636
19 *Attorney for Defendant*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, }
Plaintiff, }
CASE NO: 2:21-mj-00283-EJY
JONATHAN RISSE-SANTOS, }
Defendant. }

Based on the Stipulation of counsel, good cause appearing therefore:

IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on December 6, 2021, be vacated and continued to January 20, 2022 at the hour of 4:00 p.m., in Courtroom 3C.

DATED this 17th day of November, 2021.

ELAYNA J. YOUCAHAN
UNITED STATES MAGISTRATE JUDGE